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Attorneys for Defendant

HAWTHORNE USA, INC.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA-WESTERN DIVISION

CARMEN JOHN PERRI, an individual,

Plaintiff,

vs.

FEDERAL EXPRESS CORPORATION,
a Delaware corporation; HAWTHORNE
USA, INC. WHICH DOES BUSINESS
AS DELAWARE HAWTHORNE USA,
INC., a Delaware corporation; and Does
1-10,

Defendants.

Case No. 2:18-cv-04607-ODW-JEM

**STIPULATION TO EXTENSION
OF TIME FOR DEFENDANT
HAWTHORNE USA, INC. TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

Complaint Filed: May 25, 2018

New Response Date: August 1, 2018

Plaintiff Carmen John Perri ("Plaintiff") and Defendant Hawthorne USA, Inc. ("Hawthorne") hereby submit, through their undersigned counsel of record, pursuant to Local Rule 8-3, the following Stipulation:

1. On May 25, 2018, Plaintiff filed this action against Hawthorne;
2. On June 12, 2018, plaintiff caused the Summons and Complaint to be served on Hawthorne, thus rendering Hawthorne's response to the Complaint to become due on or before July 3, 2018;

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3. On July 3, 2018, the parties filed a Local Rule 8-3 stipulation to extend the time for Hawthorne to respond to the Complaint by 15 days so that Hawthorne could investigate the claims, making Hawthorne's deadline to file its response to the Complaint due July 18, 2018;

4. Hawthorne's investigation of Plaintiff's allegations has been ongoing in good faith;

5. Hawthorne further requested, and Plaintiff agreed to, a second stipulation under Local Rule 8-3 of the United States District Court for the Central District of California to further extend Hawthorne's responsive pleading deadline by 14 days beyond the July 18, 2018, deadline, making the deadline for Hawthorne to file and serve its response to the Complaint August 1, 2018.

NOW THEREFORE, Plaintiff and Hawthorne, by and through their respective counsel of record, file this Local Rule 8-3 stipulation providing that Hawthorne shall have a further 14 day extension to respond to the Complaint, making Hawthorne's response to the Complaint due to be filed and served no later than August 1, 2018.

Respectfully submitted,

Dated: July 24, 2018

AKERMAN LLP

By: /s/ Jeffrey S. Horton Thomas

Jeffrey S. Horton Thomas

Haley C. Greenberg

Attorneys for Defendant

Hawthorne USA, Inc.

Dated: July 24, 2018

MANNING LAW, APC

By: /s/ Craig G. Cote

Craig G. Cote

Attorneys for Plaintiff

Carmen John Perri

1 *Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(i) regarding signatures,*
2 *Jeffrey S. Horton Thomas hereby attest that concurrence in the filing of this document*
3 *and its content has been obtained as to all signatories listed.*

4
5 Dated: July 24, 2018

AKERMAN LLP

6
7 By: /s/ Jeffrey S. Horton Thomas
8 Jeffrey S. Horton Thomas
9 Haley C. Greenberg
10 Attorneys for Defendant
11 Hawthorne USA, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2018, I caused the foregoing document to be filed with the Clerk of the Court via CM/ECF, which will send notice to the following CM/ECF participants:

Joseph R. Manning, Jr., Esq.
Michael J. Manning, Esq.
Craig G. Cote, Esq.
MANNING LAW, APC
4667 MacArthur Blvd., Ste. 150
Newport Beach, CA 92660
Attorneys for Plaintiff, Carmen John Perri

David S. Wilson, III, Esq.
FEDERAL EXPRESS CORPORATION
2601 Main Street, Ste. 340
Irvine, CA 92614
Attorney for Defendant, Federal Express Corporation

Dated: July 24, 2018

/s/ Robert Diwa

Robert Diwa

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